

# 0.3

## Clients

We collect and process your personal data in order to build and grow our business relationship. We also use it to ensure that the contractual arrangements between us can be properly implemented and our relationship run smoothly.

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## What information do we collect?

1. Full Name
2. Job Role
3. Email Address
4. Phone Number
5. Requirements including details of your current team etc
6. Business information i.e. Company registration details
7. A log of our communications with you by email and telephone
8. IP Address, should you sign a contract with us electronically

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## How do we collect your information?

We collect your data when individuals:

1. are designated by their employer as our contacts for the purpose of managing client assignments, invoicing, or for managing the service relationship and paying invoices
2. contract to receive services from Saragossa
3. request information/advice from us or
4. otherwise provide Saragossa or a Saragossa employee with their contact details or other personal data.

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## How do we use your information?

1. To provide you with services or data you request
2. To perform Business Development activities
3. To perform due diligence and credit checks
4. To obtain payment for our services
5. To comply with any legal and regulatory requirement.

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## Our basis for processing your data

As a recruitment consultancy we introduce Candidates to Clients for permanent employment or contract opportunities. The exchange of personal data of our Candidates and Client contacts is a fundamental and essential part of this process.

In order to support our Candidates' career aspirations and our Clients' resourcing needs we require a database of Candidate and Client personal data containing historical information as well as current resourcing requirements.

This is our legitimate interest for processing your data.

We may also rely on the following bases, depending on our relationship status:

- **Contract** – if we have a contractual relationship either through helping you resource a permanent role or provision of a contractor, or number of contractors then this will change our basis for processing your data. Legal

- **Obligation** – if we successfully place a permanent employee or contractor with your business then we will have certain legal obligations which will impact our basis for processing your data.

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## Who we share your data with

In order to provide you with our services and meet our compliance obligations, both contractually and legally we will need to share your data with certain third parties who process your data on our behalf.

1. Various third party providers including: our CRM system, email provider, cloud storage provider, email security provider and client recruitment platforms
  - a. When you accept a Contractor placement with us this list will expand to include our timesheet system, our accountant, financial and banking systems
2. Prospective employees or contractors i.e. your name and job role when arranging interviews
3. A professional association or registration body or regulatory or law enforcement agencies if Saragossa is required by law to do so.

There will be occasions where your personal data is shared with third parties operating outside the EU and EEA.

We require minimum standards of confidentiality and data protection from such third parties. To the extent that any personal information is provided to third parties outside the EEA, or who will access the information from outside the

EEA, we will ensure that approved safeguards are in place, such as the approved Model Clauses or the EU/US Privacy Shield.

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## How long do we keep your information for?

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirement.

We maintain detailed policies and procedures regarding how and for how long we retain your personal data.

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## What are your rights?

You have certain, specific rights with respect to how we process your data. Saragossa is committed to ensuring that your rights are protected.

You may exercise your rights below by contacting us using the details at the end of this Privacy Policy.

The GDPR sets out the following rights applicable to data subjects:

1. **The Right to be Informed.** We have provided this Privacy Policy to provide you with concise, transparent, intelligible and easily accessible information about how we use your personal data.
2. **The Right of Access.** You may request access to a copy of your personal data by contacting us on the details below.
3. **The Right to Rectification.** You may ask us to rectify inaccurate information held about you. We will also get in touch with you periodically to ensure that we hold the correct details and most up to date version of your information.
4. **The Right to Erasure.** You may ask us to delete your personal data. We may not be able to erase your personal data if there is an overriding contract/legal basis for retaining it, but we will let you know this reason in response to your request.
5. **The Right to Restrict Processing.** You may ask us to restrict the processing of your personal data, and we will comply when one of the following applies
  - a. you are contesting the accuracy of your personal data that we hold, while we verify the accuracy of your personal data
  - b. the way we are processing the personal data is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead
  - c. we no longer need the personal data for the purposes of the processing, but you need the personal data to establish, exercise or defend legal claims; or

- d. you have objected to processing in the public interest or in relation to our legitimate interest, pending the verification whether any legitimate grounds we may have override your right.

While you have restricted its processing, we will only store your personal data in question, and may process it only with your consent or to establish, exercise or defend legal claims or protect the rights of another natural or legal person or for reasons of important public interest. We will notify you before lifting the processing restriction.

- 6. **The Right to Data Portability.** You may ask us to provide you with the personal information that we hold about you in a structured, commonly used, machine-readable format, or ask us to send such information to another data controller, where:

- a. the processing is based on consent or on a contract; and
- b. the processing is carried out by automated means.

Where technically feasible, we will transmit your personal data directly to the other controller.

- 7. **The Right to Object.** You have the absolute right to object to the processing of your data in relation to direct marketing. You can also object to Saragossa processing your data in connection with our legitimate purpose.
- 8. **Rights with respect to Automated Decision-Making and Profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling. At present all of our decisions involve human decision-making.

9. **Right to lodge a complaint with your data protection supervisory authority.** In the event you believe that we are processing your personal data otherwise than in accordance with the provisions of the GDPR, you have the right to lodge a complaint with the data protection supervisory authority located in the EU jurisdiction where you reside. For the UK, the supervisory authority is the UK Information Commissioner's Office [ico.org.uk](https://ico.org.uk)

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## Children's Privacy

Saragossa does not knowingly collect information from children under the age of 16 and Saragossa does not target its Website or any of its services to children under the age of 16.

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## Security and Data Storage

At Saragossa we are committed to protecting the information you provide to us. To prevent unauthorised access or disclosure, to maintain data accuracy, and to ensure the appropriate use of the information, Saragossa has in place appropriate technological and operational procedures to safeguard the information we collect.

If you believe Saragossa has handled your personal data in a manner that does not comply with this Privacy Policy, please contact us using the details below.



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## Changes to this Privacy Policy

If there are updates to this Privacy Policy, we will post those changes and update the revision date in this document, so you will always know what information we collect, how we use it, and what choices you have. For material changes to this Privacy Policy, Saragossa will actively notify affected individuals.

*This policy was last amended on 23 May 2018.*

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## How you can contact us

If you have any comments or questions about our Privacy Policy or our use of your personal data or you wish to exercise any of your rights under this Privacy Policy please contact our Data Protection Officer:



[dpo@saragossa.co.uk](mailto:dpo@saragossa.co.uk)



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